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COUNSEL FOR TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

IN RE:	§	
	§	
MICHAEL STEPHEN GALMOR,	§	CASE NO. 18-20209-RLJ-7
	§	
Debtor.	§	
	§	
And	§	
	§	
GALMOR’S/G&G STEAM SERVICE,	§	CASE NO. 18-20210-RLJ-7
INC.,	§	
	§	
Debtor.	§	

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KENT RIES, TRUSTEE,	§	
	§	
	§	
Plaintiff,	§	
	§	
v.	§	ADVERSARY NO. 20-2003
	§	
GALMOR FAMILY LIMITED	§	
PARTNERSHIP and GALMOR	§	
MANAGEMENT, L.L.C.,	§	
	§	
Defendants.	§	

**PLAINTIFF’S REPLY TO DEFENDANT’S COUNTERCLAIM**

TO THE HONORABLE ROBERT L. JONES, U.S. BANKRUPTCY JUDGE:

COMES NOW Kent Ries Trustee (the “Trustee”), Plaintiff in this Adversary Proceeding and files its Reply to the Counterclaim of the Galmor Family Limited Partnership (“GFLP”) and Galmor Management, L.L.C. (“GM”, together with GFLP, the “Defendants”), the defendants in

this Adversary Proceeding as follows. To the extent any factual allegation is not expressly admitted, it is denied.

**I. REPLY TO COUNTERCLAIM**

1. The Trustee admits the allegations in paragraph 19 of the Counterclaim.
2. The Trustee admits the allegations in paragraph 20 of the Counterclaim.
3. The Trustee admits the allegations in paragraph 21 of the Counterclaim.
4. The Trustee admits the first sentence in paragraph 22. The second sentence in the paragraph is a legal conclusion to which no response is required.
5. The Trustee denies the allegations in paragraph 23. The allegations misstate the beneficiaries of the GFLP and the purpose of the GFLP.
6. Paragraph 24 are legal conclusions to which no response is required.
7. The Trustee admits the first sentence in paragraph 25. The Trustee denies the remaining allegations of the paragraph.
8. Paragraph 26 are legal conclusions to which no response is required.
9. Paragraph 27 are legal conclusions to which no response is required.
10. Paragraph 28 are legal conclusions to which no response is required.
11. Paragraph 29 are legal conclusions to which no response is required.
12. The Trustee agrees with paragraph 30.
13. The Trustee agrees with paragraph 31.

**II. DEFENSES / AFFRIMATIVE DEFENSE TO THE COUNTERCLAIM**

14. The Counterclaim fails to state a claim upon which relief can be granted.
15. The Counterclaim is based on allegations that are barred by the applicable statute of limitations.

**IV. PRAYER**

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that the Court render judgment on Defendant's Counterclaim as follows:

- (i) ordering that the Defendants take nothing by their Counterclaim;
- (ii) awarding the Trustee his reasonable attorney's fees and costs incurred herein; and
- (iii) granting the Trustee such other and further relief as may be appropriate.

Respectfully submitted,

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By: /s/ Kent Ries

Kent Ries  
State Bar No. 1691450  
COUNSEL FOR TRUSTEE

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this the 22nd day of July, 2021, a true and correct copy of this reply was electronically served by the Court's ECF system on parties entitled to notice thereof, including on Davor Rukavina, counsel for the Defendants.

/s/ Kent Ries

Kent Ries